



Todd A. Spodek, Esq.
Direct Dial: (347) 292-8633
ts@spodeklawgroup.com

July 20, 2022

BY ECF:

Hon. Katherine Polk Failla
District Court Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 618
New York, NY 10007

MEMO ENDORSED

RE: United States v. Olanrewayu Ajibola
Case No.: 1:21-cr-00472-6 (KPF)
Fifth Request for a Modification of Release Conditions

Dear Judge Failla:

Please be advised that Spodek Law Group P.C. represents **Olanrewayu Ajibola**, the Defendant in the above-referenced matter. Mr. Ajibola respectfully requests a modification of his release conditions to allow Pretrial Services to approve out-of-state travel, rather than needing to seek Court approval for every work assignment.

On June 9, 2022, Your Honor modified Mr. Ajibola's release conditions, removing the conditions of curfew and location monitoring, as well as permission to allow him to travel to the Eastern District of Pennsylvania for employment purposes. (ECF No.: 91).

On June 21, 2022, Your Honor modified Mr. Ajibola's release conditions, permitting travel to the Middle District of Florida from June 20, 2022 to August 19, 2022. for employment purposes. (ECF No.: 96).

My. Ajibola has been re-assigned to work at the University of North Carolina through August 6, 2022, and has another assignment beginning September 29, 2022, in Kentucky. Corroborating documentation for both assignments has been provided to Pretrial Services.

Hon. Katherine Polk Failla, *District Court Judge*
Page 2 of 2

Courtesy Supervision Officer Dziopa in the District of New Jersey recommended the above-requested modification and Southern District of New York Pretrial Services does not object to Mr. Ajibola's request, while the Government takes no position.

Thank you for your consideration.

Sincerely,
Spodek Law Group P.C.
/S/ Todd A. Spodek

TAS/az

cc: All Counsel (By ECF).

Application GRANTED. Mr. Ajibola's release conditions are modified such that Pretrial Services may approve out-of-state travel for his work assignments.

Dated: July 20, 2022
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE